

REMARKS

The above amendments and following remarks are submitted in response to the Official Action of the Examiner (i.e. Paper No. 3) mailed October 24, 2000. Having addressed all objections and grounds of rejection, claims 1-20, being all the pending claims, are now deemed in condition for allowance. Reconsideration to that end is respectfully requested.

The Examiner has objected to the specification as needing certain serial numbers and filing dates which are missing from pages 1 and 2 of the specification. In response thereto, the above amendments are presented to cure these informalities.

The Chief Draftsperson has objected to the drawings. Substitute formal drawings will be submitted upon allowance of all pending claims.

Various claims were rejected under 35 USC 112, second paragraph, as being indefinite. The above amendments to the claims are deemed completely responsive to these rejections.

The Examiner has made a provisional double patenting rejection under the judicially-created doctrine of obviousness-type double patenting. In making this rejection, the Examiner has found claims 1, 6-11, and 13-20 to be unpatentable over claims 1, 6-11, and 13-20 of co-pending application 09/189,160. This finding is respectfully traversed, because, unlike the co-pending application, the rejected claims of the present application are

each limited to security profiling which grants and prohibits access to a data base on a "table by table" basis. Such limitations are not found or suggested within the claims of the referenced co-pending application.

However, because none of the subject claims have been allowed, the Examiner has correctly noted that this rejection is provisional and can be treated at a later date. In the interim, the undersigned has briefly considered the matter. At present, both applications, having the same filing date, would most likely expire on the same date, notwithstanding different issue dates. Therefore, if circumstances are not changed (e.g., extension of patent term, etc.), this rejection might become moot.

The Examiner has rejected claims 1-20 under 35 USC 102(b) as being anticipated by Cool ICE User's Guide Release 1.0. This ground of rejection is respectfully traversed. In discussing this reference, it is assumed that the Examiner is actually referring to the Cool ICE product, Release 1.0, which is accurately described by the referenced document but which is not necessarily enabling for that for which it is cited. Because, this is a convenient approach, Applicant utilizes the Examiner's terminology.

"It is axiomatic that for prior art to anticipate under §102 it has to meet every element of the claimed invention, and that such a determination is one of fact." *Hybritech Inc. v. Monoclonal Antibodies, Inc.*, 802 F.2d 1367, 231 USPQ

81, 90 (Fed. Cir. 1986). The rejection of claims 1-20 is respectfully traversed because the Examiner has not shown that the cited reference (and corresponding product) meets every element of the claimed invention.

Specifically, in rejecting claim 1 the Examiner states:

a security profile corresponding to said command language script whereby said data base management system executes said command language script and returns a corresponding response to said user terminal if and only if said user-id corresponds to said security profile.

This statement clearly misquotes this limitation of claim 1 which actually reads:

a security profile corresponding to said user-id whereby said data base management system permits said user terminal to access said first data table if and only if said security profile corresponds to access to said first data table.

Thus, the invention claimed within claim 1 is limited to a system wherein the security profile operates on a "table by table" basis. That means that the system may permit or prevent access by a particular user to individual tables within the data base.

This feature is neither shown nor suggested within the reference. In Cool ICE, Release 1.0, security profiles correspond to permitted or prohibited services of the data base manager, rather than available or unavailable portions of the data base. The reference states in apart at page 2-17, which has been cited by the Examiner:

Security profiles can be specified at the system, category or service levels. Profiles specified at a certain level will automatically be inherited by services below that level. Security profiles at the system level will apply to all services in the whole system. Security profiles specified for a category will apply to all services within that category. Security profiles specified for a service will only apply to that service.

As can be readily seen, the focus of the prior art security profiles is which data base management "operations" are permitted for a given user. Claim 1, however, is concerned with which data base "data" is available to a given user.

It is apparent that this distinction is not appreciated by the Examiner stating in part at page 6:

Cool Ice User's Guide teaches the invention substantially as cited above, they teach a data processing environment in which different levels of security may be programmed into the system for access.

The Examiner has simply not distinguished between security profiling to control data base management operation (as in the prior art) and security profiling to control availability of specific portions of the data base (as in claim 1).

Thus, the rejection of claim 1 is respectfully traversed.

The Examiner has rejected claim 2 stating in part:

(Claim 2) wherein said command language script is stored within said data base management system [page 1-9].

This ground of rejection is respectfully traversed. Claim 2 depends from claim 1 and is further limited by:

(Claim 2) wherein said at least one data table is a plurality of data tables and said security profile does not correspond to at least one of said plurality of data tables.

The Examiner has not even alleged that the reference contains this limitation. Furthermore, the reference does not contain this limitation. Therefore, the rejection of claim 2 is respectfully traversed.

In rejecting claim 3 the Examiner states:

(Claim 3) wherein said security profile is stored within said data management system. This limitation is not found within claim 3. The limitations actually found within claim 3 are found in neither the rejection nor the prior art of record. Thus, the rejection of claim 3 is respectfully traversed.

Similarly, the rejection of claim 4 is respectfully traversed, because the limitations of claim 4 are found in neither the Examiner's rejection nor the prior art of record.

In rejecting claim 6, the Examiner finds:

A security profile located within said data base management system wherein said data base management system provides access to said data base by said user terminal if and only if said user-id corresponds to said security profile.

Again, the Examiner refuses to address the claimed limitation but rather prefers to paraphrase it. The actual limitation is limited to availability of the data base on a

"table by table" basis. This limitation is found in neither the rejection nor the prior art of record. Thus, the rejection of claim 6 is respectfully traversed.

In rejecting claim 7, the Examiner again paraphrases the claim limitation. The rejection of claim 7 is respectfully traversed.

Claim 11 is limited by step a. which provides:

transmitting a service request requiring access to a one of said plurality of data tables from said user terminal. (Emphasis added)

In her rejection, the Examiner does not address the emphasized portion of the limitation. Neither does the prior art of record. Therefore, the rejection of claim 11 is respectfully traversed.

Claim 16 is limited by the combination of three means-plus-function elements. Each of these three elements is limited by a "data table", which is a portion of the data base. Nevertheless, the Examiner simply states:

means having a user-id for permitting a user to interact with a digital data base using a service request.

Thus, she does not address the limitations of claim 16. These limitations are not found within the prior art of record. Therefore, the rejection of claim 16 is respectfully traversed.

In addressing claims 12-15 and 17-20, the Examiner summarily states:

The limitations of claims 12-15 and 17-20 have been addressed above except for the following limitation: "said permitting means further comprises an industry standard personal computer"

This rejection is respectfully traversed as based upon a clearly erroneous finding of fact.

Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-20, being the only pending claims.

Respectfully submitted,

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By their attorney,

Date

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